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May 1, 2008

Cara Steiner-Riley
United States Environmental Protection Agency Region 10
Office of the Regional Counsel, Mail Code ORC 158
1200 Sixth Avenue, Suite 200
Seattle, Washington 98101

Re: Zanetti Brothers Inc.
Second Request for Information regarding mining activity within the
Coeur d'Alene Basin, Northern Idaho

Dear Cara:

Enclosed is Zanetti Brother's Inc. (ZBI) response to the United States
Environmental Protection Agency, Region 10 (EPA) letter of March 7, 2008,
addressed to ZBI.

Thank you for agreeing to an extension for submitting this information.

As we previously discussed on the telephone, ZBI has previously furnished
information to the EPA and made all of its records available for inspection and or
copying. Unfortunately, I was never provided a list of the material copied by the
EPA. The copying took place, as I recall, at ZBI'S office in Osburn, Idaho.

The only real estate transactions to occur for a number of years involved the
deeding between ZBI and ZECO Corp. ZECO Corp. is a closely held Idaho
Corporation owned by Herbert J. Zanetti, JR., and Kathy J. Zanetti. ZECO Corp.
was established for the purpose of removing the non-sand and gravel properties
(non-core) from ZBI and placing them in ZECO Corp. The properties placed in
ZECO Corp. are commercial or residential rental properties that are unrelated to
the sand and gravel business. They are located throughout the Silver Valley. These
properties are rented and have nothing to do and never have had anything to do
with the operations of ZBI. ZECO Corp. was formed to separate those businesses
from ZBI.



ZBros - CDA dm - 0001

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When the non-core ZBI Properties were deeded to ZECO Corp. on March 16, 2007 (Shoshone County Instrument No. 436658) it was later discovered that some of the core ZBI Properties were inadvertently included in the deed. Therefore, on December 20, 2007 (Shoshone County Instrument No. 442634) ZECO Corp. re-conveyed those assets to ZBI.

Finally, I am enclosing Kootenai County Instrument No. 2089686000DD, a Quitclaim Deed dated March 21, 2007, whereby ZBI conveyed to ZECO Corp. real property in Kootenai County. That property was also non-core property of ZBI and was therefore conveyed to ZECO Corp.


The real property contained in Shoshone County Instrument No. 442634 is a listing of the real property that is associated with the business operations of ZBI.

I am including a response to the information request and documents responsive to that request.

Please contact me if you have any further questions, requests or comments after reviewing the information.

Very truly yours,

HULL & BRANSTETTER CHARTERED

By: 
Michael K. Branstetter

MKB/pwk
Enclosures
cc: ZBI (no enclosures)

Response to Information Request

Respondent: Zanetti Bros., Inc.

Site: Coeur d'Alene Basin

Period: 1880 to present

1. a-b. Herbert J. Zanetti, Jr., President
Zanetti Bros., Inc.
301 E. Mullan Avenue
Osburn, Idaho 83849
Telephone: (208) 752-1178
Fax: (208) 753-5381

- c. for further contacts:

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- d. no bankruptcies

2. Financial Information

- a-c. Financial information from the years 2001 through 2006 are enclosed.

- d. no

- e. none

- f. none

- g. ZBI is a closely held subchapter S corporation owned by Herbert J. Zanetti, Jr. and his wife, Kathy J. Zanetti. Their children and their families own minor amounts of stock in ZBI.

3. A listing of all policies is attached. These were previously provided or made available for inspection and copying by the EPA.

The listed policies may or may not provide coverage for environmental matters for ZBI.

ZBI explained the nature of its business and activities in a letter to Clifford J. Villa dated June 30, 1997. All of ZBI'S records were made available to the EPA for inspection and copying.

There are no settlements with any insurance carriers.

4. Real Property
 - a-b. Attached
 - c. no
 - d. yes, see attached loan for new concrete batch plant in Osburn. The plant is on real property owned by ZBI.
 - e. to the best of ZBI'S knowledge all is attached.
 - f. no
 - g. none
5. Compliance. Respondent has reviewed documents in its office and conferred with its accountant (Dennis O'Brien at H.F. Magnuson and Company), its staff and counsel. All documents are located either in its office in Osburn, with its accountant or attorney.